

Thomas Wayne Eilertson Co. Atty. Complaint No.: 2108472-1 Court File No.:

Defense Attorney Copy



STATE OF MINNESOTA

COUNTY OF RAMSEY

RECEIVED

FEB 02 2012

CLERK, U.S. DISTRICT COURT
ST. PAUL, MINNESOTA

DISTRICT COURT

SECOND JUDICIAL DISTRICT

COURT FILE NO.:
PROSECUTOR FILE NO.: 2108472

State of Minnesota,

Plaintiff,

v.

Thomas Wayne Eilertson
(DOB: 08/07/1967)
Current Address Unknown

Defendant.

**FELONY
CRIMINAL COMPLAINT**

☐ Summons ☒ Warrant

☐ Order of Detention

☐ Amended

☐ Certified Juvenile

☐ EJJ

CR 12-37 JNE
(1)

Co-Defendant(s): Lisa Joan-Connery Co. Atty. File No.: 2108473
Eilertson

The Complainant, being duly sworn, makes complaint to the above-named Court and states that there is probable cause to believe that the Defendant committed the following offense(s):

COUNT 1

On or about the 3rd day of September, 2009, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Steven Bruns/Attorney)** in violation of MN Statute: §609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1
Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 2

On or about the 3rd day of September, 2009, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or

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Thomas Wayne Eilertson Co. Atty. Complaint No.: 2108472-1 Court File No.:



caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Steven Bruns/Attorney)** in violation of MN Statute: §609.7475.2(2); 609.7475.3(b)(1); 609.05.1
Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 3

On or about the 30th day of November, 2009, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Steven Bruns/Attorney)** in violation of MN Statute: §609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1
Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 4

On or about the 30th day of November, 2009, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Steven Bruns/Attorney)** in violation of MN Statute: §609.7475.2(2); 609.7475.3(b)(1); 609.05.1
Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 5

On or about the 30th day of November, 2009, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Richard Stanek/Hennepin Co. Sheriff)** in violation of MN Statute: §609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1
Maximum Sentence: 5 years or \$10,000 fine, or both.

**COUNT 6**

On or about the 30th day of November, 2009, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Richard Stanek/Hennepin Co. Sheriff)** in violation of MN Statute: §609.7475.2(2); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 7

On or about the 1st day of December, 2009, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Steven Bruns/Attorney)** in violation of MN Statute: §609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 8

On or about the 1st day of December, 2009, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Steven Bruns/Attorney)** in violation of MN Statute: §609.7475.2(2); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 9

On or about the 2nd day of December, 2009, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Thomas Wayne Eilertson Co. Atty. Complaint No.: 2108472-1 Court File No.:



Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Steven Bruns/Attorney)** in violation of MN Statute: §609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 10

On or about the 2nd day of December, 2009, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Steven Bruns/Attorney)** in violation of MN Statute: §609.7475.2(2); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 11

On or about the 2nd day of January, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Michael Cunniff/Hennepin Co. Registrar of Titles)** in violation of MN Statute: §609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 12

On or about the 2nd day of January, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Michael Cunniff/Hennepin Co. Registrar of Titles)** in violation of MN Statute: §609.7475.2(2); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 13

On or about the 3rd day of January, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to

Thomas Wayne Eilertson Co. Atty. Complaint No.: 2108472-1 Court File No.:

Page: 5 of 32



retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Steven Bruns/Attorney)** in violation of MN Statute: §609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 14

On or about the 3rd day of January, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Steven Bruns/Attorney)** in violation of MN Statute: §609.7475.2(2); 609.7475.3(b)(1); 609.05.1
Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 15

On or about the 5th day of January, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Kimball Foster/Hennepin Co. Examiner of Titles)** in violation of MN Statute: §609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1
Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 16

On or about the 5th day of January, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Kimball Foster/Hennepin Co. Examiner of Titles)** in violation of MN Statute: §609.7475.2(2); 609.7475.3(b)(1); 609.05.1
Maximum Sentence: 5 years or \$10,000 fine, or both.

Thomas Wayne Eilertson Co. Atty. Complaint No.: 2108472-1 Court File No.:

**COUNT 17**

On or about the 8th day of January, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, fraudulently procured, assisted in fraudulently procuring, or was privy to the fraudulent procurement of, any entry in the register of titles, or other book kept in the office of any registrar, or knowingly defrauded, or was privy to defrauding, another person by means of a false or fraudulent instrument, certificate, statement, or affidavit affecting registered land.

Said acts constituting the offense of **Fraudulent Instrument or Entry (Kimball Foster/Hennepin Co. Examiner of Titles)** in violation of MN Statute: §508.80; 609.05.1
Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 18

On or about the 29th day of January, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Mercedes Gustafson/Attorney)** in violation of MN Statute: §609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1
Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 19

On or about the 29th day of January, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Mercedes Gustafson/Attorney)** in violation of MN Statute: §609.7475.2(2); 609.7475.3(b)(1); 609.05.1
Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 20

On or about the 29th day of January, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Thomas Wayne Eilertson Co. Atty. Complaint No.: 2108472-1 Court File No.:



Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Jaime Hommerding/Attorney)** in violation of MN Statute: §609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 21

On or about the 29th day of January, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Jaime Hommerding/Attorney)** in violation of MN Statute: §609.7475.2(2); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 22

On or about the 25th day of March, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Brian Hoelscher/Attorney)** in violation of MN Statute: §609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 23

On or about the 25th day of March, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Brian Hoelscher/Attorney)** in violation of MN Statute: §609.7475.2(2); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 24

On or about the 25th day of March, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to

Thomas Wayne Eilertson Co. Atty. Complaint No.: 2108472-1 Court File No.:



retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Steven Tierney/Attorney)** in violation of MN Statute: §609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 25

On or about the 25th day of March, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Steven Tierney/Attorney)** in violation of MN Statute: §609.7475.2(2); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 26

On or about the 4th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Michael Freeman/Hennepin Co. Attorney)** in violation of MN Statute: §609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 27

On or about the 4th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Michael Freeman/Hennepin Co. Attorney)** in violation of MN Statute: §609.7475.2(2); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

Thomas Wayne Eilertson Co. Atty. Complaint No.: 2108472-1 Court File No.:

**COUNT 28**

On or about the 4th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Kimball Foster/Hennepin Co. Examiner of Titles)** in violation of MN Statute: §609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1
Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 29

On or about the 4th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Kimball Foster/Hennepin Co. Examiner of Titles)** in violation of MN Statute: §609.7475.2(2); 609.7475.3(b)(1); 609.05.1
Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 30

On or about the 4th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Michael Cunniff/Hennepin Co. Registrar of Titles)** in violation of MN Statute: §609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1
Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 31

On or about the 4th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Thomas Wayne Eilertson Co. Atty. Complaint No.: 2108472-1 Court File No.:



Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Michael Cunniff/Hennepin Co. Registrar of Titles)** in violation of MN Statute: §609.7475.2(2); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 32

On or about the 4th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Mark Thompson/Hennepin Co. Dist. Ct. Admr.)** in violation of MN Statute: §609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 33

On or about the 4th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Mark Thompson/Hennepin Co. Dist. Ct. Admr.)** in violation of MN Statute: §609.7475.2(2); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 34

On or about the 27th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Toni Beitz/Asst. Hennepin Co. Attorney)** in violation of MN Statute: §609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 35

On or about the 27th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed

Thomas Wayne Eilertson Co. Atty. Complaint No.: 2108472-1 Court File No.:



the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Toni Beitz/Asst. Hennepin Co. Attorney)** in violation of MN Statute: §609.7475.2(2); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 36

On or about the 27th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Frederick Sheridan/Asst. Hennepin Co. Attorney)** in violation of MN Statute: §609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 37

On or about the 27th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Frederick Sheridan/Asst. Hennepin Co. Attorney)** in violation of MN Statute: §609.7475.2(2); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 38

On or about the 27th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Richard Stanek/Hennepin Co. Sheriff)** in violation of MN Statute: §609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

Thomas Wayne Eilertson Co. Atty. Complaint No.: 2108472-1 Court File No.:

Page: 12 of 32

**COUNT 39**

On or about the 27th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Richard Stanek/Hennepin Co. Sheriff)** in violation of MN Statute: §609.7475.2(2); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 40

On or about the 27th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Mark Thompson/Hennepin Co. Ct. Admr.)** in violation of MN Statute: §609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 41

On or about the 27th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Mark Thompson/Hennepin Co. Ct. Admr.)** in violation of MN Statute: §609.7475.2(2); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 42

On or about the 27th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Thomas Wayne Eilertson Co. Atty. Complaint No.: 2108472-1 Court File No.:



Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Michael Freeman/Hennepin Co. Attorney)** in violation of MN Statute:

§609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 43

On or about the 27th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Michael Freeman/Hennepin Co. Attorney)** in violation of MN Statute: §609.7475.2(2);

609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 44

On or about the 27th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Kimball Foster/Hennepin Co. Examiner of Titles)** in violation of MN Statute:

§609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 45

On or about the 27th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Kimball Foster/Hennepin Co. Examiner of Titles)** in violation of MN Statute: §609.7475.2(2);

609.7475.3(b)(1); 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 46

On or about the 27th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, did knowingly cause to be presented for filing or promote the filing of a record that was not related to a valid lien or security agreement and

Thomas Wayne Eilertson Co. Atty. Complaint No.: 2108472-1 Court File No.:



committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Invalid Lien or Security Agreement (Michael Cunniff/Hennepin Co. Registrar of Titles)** in violation of MN Statute: §609.7475.2(1)(i)(A); 609.7475.3(b)(1); 609.05.1
Maximum Sentence: 5 years or \$10,000 fine, or both.

COUNT 47

On or about the 27th day of May, 2010, in Ramsey County, Minnesota, the defendant, **THOMAS WAYNE EILERTSON**, aiding and abetting and being aided and abetted by another, presented for filing or caused to be presented for filing a record with the intent that it be used to harass or defraud any other person and committed the offense with intent to influence or otherwise tamper with a judicial proceeding or with intent to retaliate against a judicial officer, a prosecutor, defense attorney, or officer of the court, because of that person's performance of official duties in connection with a judicial proceeding.

Said acts constituting the offense of **Fraudulent or Improper Financing Statement – Intent to Harass or Defraud (Michael Cunniff/Hennepin Co. Registrar of Titles)** in violation of MN Statute: §609.7475.2(2); 609.7475.3(b)(1); 609.05.1
Maximum Sentence: 5 years or \$10,000 fine, or both.

Thomas Wayne Eilertson Co. Atty. Complaint No.: 2108472-1 Court File No.:

Page: 15 of 32



STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

Your complainant is an investigator with the St. Paul Police Department and bases this complaint on police reports and his own investigation:

In February of 2010, the Hennepin County Sheriff's Office referred a case to the St. Paul Police Department regarding **Lisa Joan Connery EILERTSON (DOB 5/18/1964)** and **Thomas Wayne EILERTSON (DOB 8/7/1967)** using the name "Blessings of Liberty" to file false liens against numerous individuals and businesses.

In 2009, the Eilertsons' home at 4448 Cedar Ave. S., Minneapolis, MN, was foreclosed on by their mortgage company, which ultimately ended in a Sheriff's sale on December 8, 2009. The Hennepin County Sheriff's Office later posted a writ of recovery on the property on June 30, 2010 and returned to physically evict the Eilertsons on July 2, 2010. The Eilertsons had vacated the house before the sheriff's deputies returned on July 2, 2010.

After being instructed by P.K., a person they met on the internet, the Eilertsons began filing Uniform Commercial Code ("UCC") liens against people associated with their economic problems. The Eilertsons used the name "Blessings of Liberty" rather than their own names on these liens after being instructed by P.K. that doing so would insulate them from civil or criminal liability. In total, the Eilertsons filed liens totaling over \$114,000,000,000 throughout 2009 and 2010. All of these UCC liens were filed at the Minnesota Secretary of State's Office located at 60 Empire Drive, Ste. 100, St. Paul, Ramsey County, MN.

Below is a partial list and description of the liens filed by the Eilertsons:

On September 3, 2009, the Eilertsons used an online account to file a UCC Financing Statement against Steven H. Bruns, an attorney with Peterson, Fram & Bergman. The Eilertsons claimed that Mr. Bruns owed them \$5,000,000 due to a "trespass." Mr. Bruns represented the lender during the foreclosure of the Eilertson's Cedar Ave. home, and his name appears in numerous court documents relating to the foreclosure.

On November 30, 2009, the Eilertsons went to the MN Secretary of State's Office and filed another UCC Financing Statement against Steven Bruns and his firm, Peterson, Fram & Bergman. In the same filing, the Eilertsons listed Hennepin County Sheriff Richard W. Stanek and the Hennepin County Sheriff's Office as debtors. Sheriff Stanek's office was involved in the foreclosure and subsequent Sheriff's sale of the Eilertson's Minneapolis home.

On December 1, 2009, the Eilertsons used an online account to file an amended UCC Financing Statement against Steven H. Bruns. This amended filing did not list any additional money to the debt, but it added personal property to the lien.

On December 2, 2009, the Eilertsons went to the MN Secretary of State's Office and filed another UCC Financing Statement against Steven H. Bruns. This filing did not list any additional money to the debt, but it added personal property to the debt, including Mr. Bruns' personal residence in Minneapolis.

On January 2, 2010, the Eilertsons used an online account to file a UCC Financing Statement against Michael Cunniff, the Hennepin County Registrar of Titles. This filing claimed that Mr. Cunniff was indebted to Lisa

Thomas Wayne Eilertson Co. Atty. Complaint No.: 2108472-1 Court File No.:

Page: 16 of 32



Eilertson and Blessings of Liberty for over \$10.2 million. As Registrar of Titles, Mr. Cunniff is an attorney and was involved in the foreclosure and Sheriff's sale of the Eilertsons' home in Minneapolis.

On January 3, 2010, the Eilertsons used an online account to file an amended UCC Financing Statement against Steven Bruns and others. This amended filing alleges that Mr. Bruns and others owe Blessings of Liberty over \$500,000,000 for trespass.

On January 5, 2010, the Eilertsons used an online account to file a UCC Financing Statement against Kimball Foster, the Hennepin County Examiner of Titles. This filing claimed that Ms. Foster was indebted to Lisa Eilertson and Blessings of Liberty for over \$5.1 million and attached a secured interest to her personal residence in St. Paul. As the Examiner of Titles, Ms. Foster is an attorney who advises the Registrar of Titles and was involved in the foreclosure and Sheriff's sale of the Eilertsons' home in Minneapolis.

On January 8, 2010, the Eilertsons filed documents with the Ramsey County Registrar of Titles, located at 90 W. Plato, St. Paul, Ramsey County, MN. These documents placed a lien on the private residence of Kimball Foster, also located in Ramsey County. These documents claimed that Kimball Foster was indebted to Blessings of Liberty for more than \$5.1 million. While Blessings of Liberty was listed as the debtor, the check used to file the lien came from the Eilertsons' joint checking account and was signed by Lisa EILERTSON.

On January 29, 2010, the Eilertsons used an online account to file a UCC Financing Statement against Mercedes Gustafson and Jaime Hommerding, attorneys with Messerli & Kramer. Messerli & Kramer represented Discover Bank in a civil case against Thomas EILERTSON and FIA Card Services in a collection action against Lisa EILERTSON. The UCC Financing Statement claimed that these attorneys were indebted to Blessings of Liberty for over \$40.7 million.

On March 25, 2010, the Eilertsons used an online account to file a UCC Financing Statement against Brian Hoelscher, an attorney who worked for Excel Title. This financing statement alleged that Mr. Hoelscher was indebted to Blessings of Liberty for over \$2.5 million. Excel Title provided title insurance to the lender when the Eilertsons refinanced their home in 2002, 2004, 2005 and 2007. Mr. Hoelscher recalled receiving the lien paperwork from the Eilertsons but discarded it because he had not conducted any personal business with the Eilertsons and knew it to be an illegitimate lien.

On March 25, 2010 the Eilertsons used an online account to file a UCC Financing Statement against Steven Tierney, claiming that he owed Blessings of Liberty over \$2.5 million. Mr. Tierney is an attorney whose office used to work with Excel Title and was involved in closing one of the Eilertsons' mortgages that was ultimately foreclosed upon. Mr. Tierney informed police that he had no idea how his name later came to be associated with the UCC Financing Statement filed against him.

In a court filing on April 30, 2010 signed by both Thomas and Lisa EILERTSON, they accuse Mark S. Thompson (Hennepin County District Court Administrator), James T. Swenson (Hennepin County Chief Judge), Michael O. Freeman (Hennepin County Attorney), Toni Beitz (Assistant Hennepin County Attorney), Rick Sheridan, Kimball Foster (Hennepin County Examiner of Titles), Michael Cunniff (Hennepin County Registrar of Titles), Richard W. Stanek (Hennepin County Sheriff), Brad Erickson (Hennepin County Sheriff's Deputy) and others of participating in a conspiracy to defraud the Eilertsons of their home that was sold at a Sheriff's sale on December 8, 2009. The filing then went on to demand \$100,000,000,000 in compensatory and punitive damages.

Thomas Wayne Eilertson Co. Atty. Complaint No.: 2108472-1 Court File No.:



On May 4, 2010, the Eilertsons used an online account to file a UCC Financing Statement against several individuals and offices. The indebted parties in this filing include Michael O. Freeman (Hennepin County Attorney), Kimball Foster (Hennepin County Examiner of Titles), Michael H. Cunniff (Hennepin County Registrar of Titles), and Mark S. Thompson (Hennepin County District Court Administrator). This filing claimed that these parties, among others, owed Blessings of Liberty more than \$110 billion. All of the listed individuals were in some way associated with the foreclosure and Sheriff's sale of the Eilertsons' Minneapolis home.

On May 27, 2010, the Eilertsons filed an amended 267 page UCC Financing Statement against multiple people. This amended filing claimed that the following people and organizations were indebted to Blessings of Liberty for more than \$110.2 billion. The list includes:

Toni A. Beitz – Assistant Hennepin County Attorney
 Frederick Sheridan – Assistant Hennepin County Attorney
 Richard W. Stanek – Hennepin County Sheriff
 Mark S. Thompson – Hennepin County Court Administrator
 Michael O. Freeman – Hennepin County Attorney
 Kimball Foster – Hennepin County Examiner of Titles
 Michael Cunniff – Hennepin County Registrar of Titles

Toni A. Beitz is an Assistant Hennepin County Attorney who represented Hennepin County employees in judicial proceedings to remove liens previously filed by the Eilertsons. Frederick Sheridan is an Assistant Hennepin County Attorney. As part of his duties, he advised the Hennepin County Recorder's Office regarding the Eilertsons submitting incomplete paperwork. He mailed letters to the Eilertsons in November and December of 2009, but the letters were ultimately returned to him.

The people listed above all state that they have never engaged in any sort of personal business with the Eilertsons or Blessings of Liberty. Also, all of the UCC Financing statements described above were filed with the Minnesota Secretary of State's Office in St. Paul, whether it was done in person by the Eilertsons or online.

During the course of executing a search warrant on June 18, 2010 at the Eilertsons' home at 4448 Cedar Ave. S., Minneapolis, MN, police recovered thousands of documents and other evidence related to the filing of UCC Financial Statements and other liens. The Eilertsons also spoke extensively to this investigator. During the course of the conversation, both of the Eilertsons spoke in a manner that suggested they were both fully participating in the process of filing liens against people. The Eilertsons indicated that they would release all of the liens that they filed if they could just have the title to their home at 4448 Cedar Ave. S., Minneapolis, MN. When asked regarding how they determined the amount of damages when filing the liens, Thomas EILERTSON indicated that the amounts were arbitrary.

Among the items seized by the police were two computers belonging to the Eilertsons. A search of one of the computers revealed a number of recorded conversations between Thomas and Lisa EILERTSON and P.K. During the conversations, the Eilertsons asked P.K. how to file liens against people and how to use the UCC to create binding contracts with people who do not respond to the Eilertsons' notices. A review of the various conversations makes it clear that both Thomas and Lisa EILERTSON are involved in filing the various UCC documents and other liens and that they are using these as a means to intimidate or seek revenge against people. Based on all of the evidence seized as well as the statements of both Thomas EILERTSON and Lisa EILERTSON, this investigator believes that the Eilertsons used the name "Blessings of Liberty" to file all of the liens previously discussed in an attempt to evade criminal or civil liability for their actions.

Thomas Wayne Eilertson Co. Atty. Complaint No.: 2108472-1 Court File No.:

Page: 18 of 32



P.K. described how the Eilertsons can use the UCC to “do death by a thousand papercuts.” During one conversation Thomas EILERTSON told P.K. that he gave the sheriff five days to remove the foreclosure notice or the sheriff would “forfeit his bond,” which this investigator understands to mean that Thomas EILERTSON would file some type of UCC lien against Sheriff Stanek. Thomas EILERTSON also described how the Hennepin County Attorney was preventing him from meeting Sheriff Stanek and “accepting his oath.”

Thomas Wayne Eilertson Co. Atty. Complaint No.: 2108472-1 Court File No.:



Complainant requests that Defendant, subject to bail or conditions of release, be:
(1) arrested or that other lawful steps be taken to obtain Defendant's appearance in court; or
(2) detained, if already in custody, pending further proceedings; and that said Defendant otherwise be dealt with according to law.

COMPLAINANT'S NAME:

Daniel Anderson

COMPLAINANT'S SIGNATURE:

Subscribed and sworn to before the undersigned this _____ day of _____, 20____.

NAME/TITLE:

SIGNATURE:

Being authorized to prosecute the offenses charged, I approve this complaint.

Date: 12/30/2011

PROSECUTING ATTORNEY'S SIGNATURE:

Name: John J. Choi
Assistant Ramsey County Attorney
50 West Kellogg Blvd, #315
St. Paul, MN 55102
651-266-3222/jh
Attorney Registration #257175

Thomas Wayne Eilertson Co. Atty. Complaint No.: 2108472-1 Court File No.:

**FINDING OF PROBABLE CAUSE**

From the above sworn facts, and any supporting affidavits or supplemental sworn testimony, I, the Issuing Officer, have determined that probable cause exists to support, subject to bail or conditions of release where applicable, Defendant's arrest or other lawful steps be taken to obtain Defendant's appearance in court, or Defendant's detention, if already in custody, pending further proceedings. Defendant is therefore charged with the above-stated offense.

☐ **SUMMONS**

THEREFORE YOU, THE ABOVE-NAMED DEFENDANT, ARE HEREBY SUMMONED to appear on the ____ day of _____, 20__ at _____ before the above-named court at _____ to answer this complaint.

IF YOU FAIL TO APPEAR in response to this SUMMONS, a WARRANT FOR YOUR ARREST shall be issued.

☒ **WARRANT**

☐ *Execute in MN Only* ☐ *Execute Nationwide* ☐ *Execute in Border States*

To the Sheriff of the above-named county; or other person authorized to execute this warrant: I hereby order, in the name of the State of Minnesota, that the above-named Defendant be apprehended and arrested without delay and brought promptly before the above-named court (if in session), and if not, before a Judge or Judicial Officer of such court without unnecessary delay, and in any event not later than 36 hours after the arrest or as soon as such Judge or Judicial Officer is available to be dealt with according to law.

☐ **ORDER OF DETENTION**

Since the above-named Defendant is already in custody, I hereby order, subject to bail or conditions of release, that the above-named Defendant continue to be detained pending further proceedings.

Bail: \$100,000.00**Conditions of Release: No contact with the twelve victims as described in the complaint.**

This complaint, duly subscribed and sworn to, is issued by the undersigned Judicial Officer this ____ day of _____, 20__.

JUDICIAL OFFICER:**NAME:****TITLE:****SIGNATURE:**

Sworn testimony has been given before the Judicial Officer by the following witnesses:

COUNTY OF RAMSEY
STATE OF MINNESOTA

Clerk's Signature or File Stamp:

STATE OF MINNESOTA

vs.

THOMAS WAYNE EILERTSON

Plaintiff,

Defendant.

RETURN OF SERVICE

I hereby Certify and Return that I have served a copy of this COMPLAINT - WARRANT upon the Defendant herein named.

Signature of Authorized Service Agent:

Thomas Wayne Eilertson Co. Atty. Complaint No.: 2108472-1 Court File No.:



FINDINGS OF FACT

Probable cause found that defendant committed the offenses charged.

Ordered defendant's motion to dismiss denied.

Plea of not guilty to all counts entered.

Trial and hearing on all issues set.

Dated: _____

JUDGE OF DISTRICT COURT